

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
Located in Baltimore

<p>IN RE</p> <p>HERDISENE MCINTYRE GREEN</p> <p>Debtor</p>	<p>Case No. 15-15219-JFS Chapter 13</p>
<p>NATIONSTAR MORTGAGE LLC 8950 Cypress Waters Blvd Coppell, TX 75019</p> <p>Movant v.</p> <p>KENNETH MCINTYRE 3423 Ripple Road Baltimore, Md 21244 and HERDISENE MCINTYRE GREEN 3423 Ripple Road Baltimore, MD 21224</p> <p>Respondents</p>	<p>Motion No.</p>

MOTION FOR RELIEF FROM AUTOMATIC STAY

COMES NOW, Nationstar Mortgage LLC, its successors and/or assigns, movant, by its attorneys, Mark D. Meyer, Esq., and Rosenberg & Associates, LLC, and respectfully represents as follows:

1. Jurisdiction is based on 11 U.S.C. Section 362(d)-(f) and 1301.
2. On or about April 13, 2015, Herdisene McIntyre Green ("Debtor") filed a Voluntary Petition in the Court under Chapter 13 of the Bankruptcy Code.
3. Nancy Grigsby is the Chapter 13 trustee of the Debtor's estate.
4. Kenneth McIntyre ("Co-Debtor") is a co-debtor on this Note.
5. At the time of the initiation of these proceedings, the Debtor owned a parcel of leasehold real estate improved by a residence with a legal description of "All that lot of ground, situate, lying and being in Baltimore County, State of Maryland, and described as follows, that is to say:
BEING known and designated as Lot No. 11 as shown on the plat of Section One, Lynne Acres, which plat is recorded among the Land Records of Baltimore County in Plat Book GLB 19, Folio 41. The improvements thereon being known as No.

MARK MEYER
DC BAR 475552
MD BAR 15070
VA BAR 74290

ROSENBERG &
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7910 WOODMONT AVENUE
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BETHESDA, MARYLAND 20814
(301) 907-8000
FILE NUMBER: 39591

3423 Ripple Road.

BEING the same lot of ground which was granted and conveyed by Sherry Properties, Inc. to Herdisene McIntyre Green by Deed dated June 20, 1997 and recorded among the Land Records of Baltimore County in Liber 12297 folio 719. Parcel #02-0210450340" also known as 3423 Ripple Road, Windsor Mill, MD 21244 (hereinafter "the subject property").

6. The subject property is encumbered by a Deed of Trust securing the note, which is currently held by the movant. Attached are redacted copies of any documents that support the claim, such as promissory notes, purchase order, invoices, itemized statements of running accounts, contracts, judgments, mortgages and security agreements in support of right to seek a lift of the automatic stay and foreclose if necessary.

7. The total amount due under the Deed of Trust securing the Movant as of June 16, 2015, including attorney's fees and court costs, is approximately \$190,345.62.

8. The Debtor is in default under the Deed of Trust, and the Movant has accelerated the entire balance of the Note and Mortgage and interest continues to accrue.

9. The Debtor has not made post-petition payments for the months of May 1, 2015 - June 1, 2015, and equity in the Debtor's residence is dissipating.

10. The Movant lacks adequate protection of its interest in the subject property.

11. The Movant has been and continues to be irreparably injured by the stay of Sections 362 and 1301 of the Bankruptcy Code, which prevents the Movant from enforcing its rights under the Note and Deed of Trust.

12. Cause exists for lifting the automatic stay imposed by Sections 362 and 1301 of the Bankruptcy Code to enable the Movant to enforce its rights under its Note and Deed of Trust.

13. The subject property is not necessary for an effective reorganization.

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WHEREFORE, the Movant, Nationstar Mortgage LLC its successors and/or assigns, respectfully requests that this Honorable Court:

1. Enter an order terminating the automatic stay imposed by Sections 362 and 1301 of the Bankruptcy Code to enable it to proceed with a foreclosure sale, accept a deed in lieu or agree to a short sale of the real property and improvements located at 3423 Ripple Road, Windsor Mill, MD 21244; and

2. Grant such other and further relief as may be just and necessary.

/s/ Mark D. Meyer, Esq.

Mark D. Meyer, Esq.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 25, 2015, a copy of the foregoing Motion for Relief from the Automatic Stay was mailed, first class postage prepaid, upon the following who were not served electronically:

Kenneth McIntyre
3423 Ripple Road
Baltimore, Md 21244

Nancy Grigsby, Trustee
P.O. Box 958
Bowie, MD 20718

Herdisene McIntyre Green
3423 Ripple Road
Baltimore, MD 21224

/s/ Mark D. Meyer, Esq.
Mark D. Meyer, Esq.

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